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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK  
POUGHKEEPSIE DIVISION

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In Re:  
CENTRAL PARK ESTATES, LLC

Chapter 7 (Involuntary)  
Case No. 12-36868(CGM)

Debtor.

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**APPLICATION FOR ORDER SHORTENING TIME PERIOD FOR NOTICE UNDER  
FED.R.BANKR.P. 9006(c)(1)**

The application of Raymond P. Raiche, Esq. attorney for VNB NEW YORK CORP., respectfully represents:

- 1) I am the attorney for VNB New York Corp., hereinafter "Movant" or "VNB", a secured creditor and as such, I am fully familiar with the facts and circumstances set forth herein.
- 2) I make this application under Fed.R.Bankr.P. 9006(c)(2) in order to file a motion before this Court, on January 8, 2013 @ 9:30 a.m., declaring the above-referenced Petition *Void Ab Initio*.
- 3) This Court has *Sua Sponte* scheduled an Order to Show Cause to dismiss this case currently returnable January 8, 2013 at 9:30 AM.

4) Upon information and belief, the alleged creditor, Mohamed Hussan t/a Lucky Contracting Co., does not exist. This Chapter 7 Involuntary filing is an attempt by the Debtor to commit fraud upon this Court as well as the secured creditor, VNB.

5) The Debtor, Central Park Estates, LLC, at the time of this filing, had an open case pending in the United States Bankruptcy Court Southern District, Manhattan Division under Case No. 12-11703(JMP).

6) This applicant, on behalf of VNB New York Corp., obtained from the Hon. James M. Peck, U.S. Bankruptcy Judge, Southern District of New York an Order lifting the automatic stay against real property held by the debtor in Sullivan County, New York.

7) Concerned about the fraudulent activities surrounding the initial Chapter 7 Involuntary Bankruptcy, Judge Peck, did not dismiss the case against the Debtor, rather held it open in an attempt to prevent additional fraudulent filings and allowing VNB New York Corp. to commence another foreclosure sale.

8) VNB has conducted a foreclosure sale and an issue surrounding the validity of title has been raised.

9) This applicant desires to bring a motion declaring the second petition against the Debtor *Void Ab Initio*, on short notice to be scheduled on January 8, 2013 at 9:30 AM, the same time the Court currently has scheduled its Order to Show Cause.

10) Reduction of the time period in question is not prohibited under Fed.R.Bankr.P. 9006(c)(2) and the rules listed therein.

WHEREFORE, applicant requests entry of the order submitted herewith.

Date: Goshen, NY  
December 26, 2012

/s/ Raymond. P. Raiche

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